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12 ROBERT VACCARI, and JAKE ADAMS

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

CASE NO. 5:22-cv-00949-KK-(SHKx)

*Assigned for All Purposes to:*  
*Hon. Kenly K. Kato – Courtroom 3*

15 L.C., a minor by and through her  
16 guardian *ad litem* Maria Cadena,  
17 individually and as successor-in-interest  
18 to Hector Puga; I.H., a minor by and  
19 through his guardian *ad litem* Jasmine  
20 Hernandez, individually and as  
21 successor-in-interest to Hector Puga;  
22 A.L., a minor by and through her  
23 guardian *ad litem* Lydia Lopez,  
24 individually and as successor-in-interest  
25 to Hector Puga; and ANTONIA  
26 SALAS UBALDO, individually,

27 Plaintiffs,

28 vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA;  
ROBERT VACCARI; JAKE ADAMS;  
and DOES 6-10, inclusive,

Defendants.

**COUNTY DEFENDANTS' NOTICE  
OF NON-OPPOSITION  
PLAINTIFFS' EX PARTE  
APPLICATION FOR APPROVAL  
OF COMPROMISE OF THE  
MINOR PLAINTIFFS AND  
NOMINAL DEFENDANT'S  
CLAIMS**

*Trial Date: June 2, 2025*

*Complaint filed: 06/07/2022*

*FAC filed: 10/18/22*

*SAC filed: 01/13/23*

*TAC filed: 05/12/23*

**TO ALL PARTIES AND TO THEIR COUNSEL OF RECORD:**

Defendants, COUNTY OF SAN BERNARDINO, ROBERT VACCARI, and JAKE ADAMS (collectively, “County Defendants”) have reviewed Plaintiffs’ *Ex Parte* Application for Approval of Compromise of the Minor Plaintiffs and Nominal Defendant’s Claims submitted to this Court. (Dkt #198 and 198-12)

County Defendants have no opposition to Plaintiffs’ *Ex Parte* Application for Approval of Compromise of the Minor Plaintiffs and Nominal Defendant’s Claims.

DATED: July 21, 2025

**LYNBERG & WATKINS**  
A Professional Corporation

By: /s/ Shannon L. Gustafson  
**SHANNON L. GUSTAFSON**  
**AMY R. MARGOLIES**  
Attorneys for Defendant,  
COUNTY OF SAN BERNARDINO  
ROBERT VACCARI, and JAKE ADAMS